

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Richard Horton,

Plaintiff,

v.

City of Columbus, et al.,

Defendants.

Case No. 2:23-cv-3888

Chief Judge Algenon L. Marbley

Magistrate Judge Elizabeth Preston Deavers

AMENDED NOTICE OF DEPOSITION OF RHONDA CURRY

Please take notice that Defendants City of Columbus and Brenda K. Walker, pursuant to Fed. R. Civ. P. 30, will take the deposition upon oral examination before a court reporter of Rhonda Curry on Tuesday, August 06, 2024, at 10:00 a.m. at the Columbus City Attorney's Office, 77 North Front Street, Fourth Floor, Columbus, Ohio 43215. The original deposition scheduled for June 25, 2024, was rescheduled at opposing counsel's request.

The deposition will be taken stenographically, conducted under the supervision of an officer who is authorized by law to administer oaths, and will be video recorded. Said deposition is for discovery purposes and will continue from day to day until completed.

The subpoena issued to Rhonda Curry via a process server with proof of service is attached as Exhibit A.

Respectfully submitted,

/s/ Alana V. Tanoury

Alana V. Tanoury (0092265)

Aaron D. Epstein (0063286) – Lead

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*Counsel for Defendants City of Columbus
and Brenda K. Walker*

CERTIFICATE OF SERVICE

I hereby certify that, on July 8, 2024, I electronically filed the foregoing with the Court using the Court's CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court's CM/ECF system.

/s/ Alana V. Tanoury

Alana V. Tanoury (0092265)

AO 88A (Rev. 12/20) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

RICHARD HORTON,

Plaintiff

v.

CITY OF COLUMBUS, et al.

Defendant

Civil Action No. 2:23-cv-3888

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To:

Rhonda Curry, 1730 Old Leonard Ave, Columbus, Ohio 43219

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Columbus City Attorney's Office
77 N. Front Street, 4th Floor
Columbus, Ohio 43215

Date and Time: 08/06/2024 10:00 am

The deposition will be recorded by this method: stenographically and will be video recorded

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

/s/ Aaron D. Epstein

*Signature of Clerk or Deputy Clerk**Attorney's signature*

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)*

The City of Columbus and Brenda Walker, who issues or requests this subpoena are:
Aaron Epstein, 77 N. Front Street, 4th Floor, Columbus, Ohio 43215; adepstein@columbus.gov; (614) 645-7385

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Exhibit A

AO 88B (Rev. 02/14) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 2:23-cv-3888

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any) Rhonda Curry
on (date) 6/21/2024.

☒ I served the subpoena by delivering a copy to the named person as follows: by serving
Rhonda Curry
on (date) 6/24/2024 at 6:35pm; or

☐ I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: 6/24/2024

Erikam Cremeans

Server's signature

Erika M Cremeans - Process Server

Printed name and title

**2862 Johnstown Rd.
Columbus, OH 43219**

Server's address

Additional information regarding attempted service, etc.: